

National Provider Identifier Frequently Asked Questions

SECTION III - Do I need to subpart?

1. Am I required to subpart?

You are not required to subpart, but you may want to if you qualify.

2. How do I know if I qualify to subpart?

If you are an **individual** health care provider such as a physician, dentist, nurse, chiropractor, etc., you do not qualify to subpart. When you receive your NPI you will be identified with an Entity Type Code 1 (Health care providers who are individual human beings, including sole proprietors.)

If you are an **organization**, you may subpart. When you receive your NPI you will be identified with an Entity Type Code 2 (Health care provider who is other than an individual human being). Examples of organizations are hospitals; home health agencies; clinics; nursing homes; residential treatment centers; laboratories; ambulance companies; group practices; suppliers of durable medical equipment, supplies related to health care, prosthetics and orthotics; and pharmacies.

3. Does BlueCross BlueShield of Tennessee set the rules for subparting?

No. BlueCross BlueShield of Tennessee and other health plans do not set these rules. They are included in the NPI final rule published by the Department of Health and Human Services in the Federal Register.

4. Who may be a subpart?

A subpart may be a component of an organization that may have a separate address, may be separately licensed, may bill separately, but is not a separate legal entity. Examples of subparts are:

- Outpatient departments
- Surgical centers
- Psychiatric units
- Laboratories
- Rendering service locations for organizational providers
- Physician association group practice locations

5. I'm licensed in more than one medical specialty. Am I eligible for one NPI for each specialty?

No. Individuals (Entity Type 1) may receive only one NPI. In most cases it is expected that the NPI is the only one the individual will receive for life.

6. We are in a group practice. Do each of us qualify for an NPI as a subpart?

No, an individual human being is not a subpart; but each member of the practice qualifies for an individual NPI.



The group practice, because it is a legal entity, would qualify for an organization NPI. And the practice may subpart. For example, the practice may need to identify different practice locations.

7. Can health insurers require me to subpart?

Health insurance payers cannot require providers to subpart. However, providers may choose to subpart within the limits of the regulations when doing so ensures appropriate reimbursements from payers. For example, CMS has offered guidance on subparting to support appropriate reimbursement. Providers needing assistance may contact their local Provider Relations office Network Manager or William Lockery at (423) 535-3722.

8. When does a subpart need its own NPI?

Federal regulations do not require subparts to obtain their own NPIs. They may use the covered organization's NPI to conduct business using HIPAA standard transactions. Although the decision to obtain a unique NPI for a subpart is a business decision made by the covered organization, there may be situations where obtaining an NPI for a subpart is the obvious decision. For example, if a covered entity (such as a hospital) owns a number of home health agencies, each of which has entered into its own contract with Medicare, each home health agency may desire its own NPI. Some other reasons that a covered organization might decide to obtain a unique NPI for a subpart include the following:

- Transactions involving the subpart need to be received into a different account or at a different physical or electronic address.
- Terms of the subpart's contracts with payers differ from those of the covered organization.
- The nature of the services delivered by the subpart is materially different from those delivered by the covered organization.

9. If I obtain one or more NPIs for Medicare or Medicaid business, will I need new ones to file claims with private insurers?

No. Once you receive an NPI, it must be used for all relevant health insurance related transactions.

10. How will subparting affect my reimbursements from BlueCross BlueShield of Tennessee?

Reimbursement from BlueCross BlueShield of Tennessee should not be affected.